

**Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, New York, 11427**

~~~~~  
**Abdul K. Hassan, Esq.**  
Email: abdul@abdulhassan.com  
**Employment and Labor Lawyer**

Tel: 718-740-1000  
Fax: 718-740-2000  
Web: www.abdulhassan.com

**January 15, 2021**

**Via ECF**

Hon. Valerie E. Caproni, USDJ  
United States District Court, SDNY  
40 Foley Square, Courtroom 443  
New York, NY 10007  
Tel: 212-805-6350

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: **1/19/2021**

**MEMO ENDORSED**

**Re: Hughes v. Love Conquers All Inc. et al**  
**Case #: 20-CV-02697 (VEC)(KNF)**  
**Motion for Extension of Time**

Dear Judge Caproni:

My firm represents plaintiff in the above-referenced action, and I respectfully write to request a one-month extension of the January 15, 2021 deadline for Plaintiff to submit a declaration as part of his motion for a default judgment.

We have been working diligently to secure the declaration but as I explained previously, the task has been made extremely difficult in light of Plaintiff's unexpectedly incarceration and the COVID-19 measures that have been implemented. Notably, since the last request I have been able to locate and speak with another attorney as to plaintiff's current whereabouts and we have been making efforts to try to locate him and to make arrangements for him to make and execute the required declaration. I was hoping to get the declaration by today's deadline so as to obviate the need for this request but was unable to do so. Two prior requests for an extension of this deadline were made and granted.

We apologize for any inconvenience and thank the Court in advance for its time and consideration.

Respectfully Submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan

By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff Kevin Hughes*

Application GRANTED in part. Plaintiff's affidavit is due by **February 2, 2021**. No further extensions will be granted. If Plaintiff fails to submit the affidavit by February 2, 2021, this case will be dismissed for failure to prosecute.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

1/19/2021